

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

Plaintiff,

v.

GLOBAL BUSINESS TRAVEL GROUP,
INC., and CWT HOLDINGS, LLC,

Defendants.

Civil Action No.: 1:25-cv-00215-VM

**ORDER GRANTING IN PART AND
DENYING IN PART THE UNITED
STATES' LETTER MOTION TO
COMPEL, ECF NO. 82**

On April 17, 2025, the United States filed a letter motion to compel, ECF No. 82, requesting that the Court order that (1) Defendants provide the names of specific individuals for their preliminary witness list no later than May 1, 2025; and (2) any substitutions after that date count as one of the six “adds” allowed under the Civil Case Management Plan and Scheduling Order, ECF No. 63 (the “CMO”). On April 21, 2025, Defendants Global Business Travel Group, Inc., and CWT Holdings, LLC (collectively, “Defendants,” and together with the United States, the “Parties”), filed their response in opposition, ECF No. 88. On April 23, 2025, the Court held a status conference to hear arguments on the letter motion. Having considered the Parties’ arguments, the Court grants in part and denies in part the United States’ motion to compel.

IT IS HEREBY ORDERED:

1. Defendants shall provide the name of the natural person who is a current or former director, officer, or employee for each third party identified on Defendants’ March 31, 2025 preliminary witness list and who is the individual that Defendants may call at trial (the “Testifying Individuals”) **on a rolling basis as those names are available to them**, and in all events no later than **May 6, 2025, at 5 pm ET**.

2. Between **May 6, 2025, at 5 pm ET** and **May 20, 2025, at 5 pm ET**, Defendants may “correct” the names of Testifying Individuals provided to the United States as of May 6, 2025, provided that:

- A. Defendants must notify the United States of their “corrections” at least seven (7) calendar days prior to the scheduled date for the deposition of the individual previously identified as the Testifying Individual for that third party;
- B. The deposition of the newly named Testifying Individual is scheduled at least seven (7) calendar days after the date upon which Defendants provide the “correction” and for a date on or before the close of fact discovery on June 3, 2025, absent mutual agreement of the Parties to schedule the deposition at a different date; and
- C. Productions of documents relevant for the newly named Testifying Individual that are responsive to all Parties’ subpoenas are produced to all Parties at least seven (7) calendar days prior to the scheduled date for the deposition of the newly named Testifying Individual.
- D. Once the Testifying Individual for a third party has been deposed, Defendants may no longer “correct” the name of the Testifying Individual for that third party, absent good cause shown.

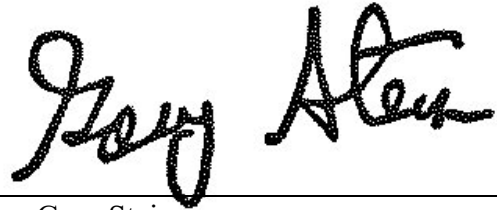
3. After **May 20, 2025**, Defendants may only make “corrections” to the names of Testifying Individuals provided to the United States on May 6, 2025, upon good cause shown.

4. For the avoidance of doubt, no “correction” to Defendants’ preliminary witness list made up to and including June 3, 2025, and in accordance with either Paragraphs 2 or 3 above, shall count as an “add” within the meaning of Paragraph 19(B) of the CMO.

5. Any natural person appearing on Defendants’ June 4, 2025 final witness list who was not identified as one of the 25 witnesses on Defendants’ preliminary witness list, including as a “corrected” name of a Testifying Individual as allowed by Paragraphs 2 and 3 of this Order, shall count as one of the six (6) “adds” to which each side is entitled under Paragraph 19(B) of the CMO.

SO ORDERED:

DATED: New York, New York
May 1, 2025

A handwritten signature in black ink, appearing to read "Gary Stein", written over a horizontal line.

Hon. Gary Stein
United States Magistrate Judge